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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

FILED

ANTHONY ANGELO DEGENS )

Plaintiff, Pro Se )

V )

FEDERAL BUREAU OF INVESTIGATION )  
And DAVID M. HARDY )

Defendants )

JUN 29 2020

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

2:20-cv-971

COMPLAINT

**1** Federal Bureau of Investigation, 935 Pennsylvania Avenue, Washington, DC, 20535-0001. FBI Agent Mr. David M. Hardy, Section Chief of the Record/Information Dissemination Section (RIDS), Records Management Division (RMD), formally at Federal Bureau of Investigation Headquarters, Washington, D.C., and currently located in Winchester, Va., 22602—4483. Charge of Misconduct against David M. Hardy and the Federal Bureau of Information.

**2** Plaintiff Pro Se Anthony Angelo DeGenes, 300 Van Wyck Avenue, Pittsburgh, Pa., 15227, 412 884 6793, To the Court: I'm accusing Mr. David Hardy of being guilty of committing an act of FBI Misconduct, because he lied. I'm accusing Mr. Hardy of not being truthful. Mr. Hardy states in EXHIBIT #1- '**Second Declaration of David M. Hardy**', signed by Mr. David Hardy and dated March 26, 2012, on pages 8 & 9, (copy attached), Mr. Hardy states my name was thoroughly searched by 277 FBI Agents, under Mr. Hardy's command, and at no time-- Mr. Hardy states-- did my name ever surface on the FBI's Watch List/RICO List.

**3** I also want to remind Mr. Hardy that the information I'm seeking is guaranteed to me, since I'm an American Citizen, I have the right to whatever records, information or anything else that is pertaining to me under the **FREEDOM OF INFORMATION ACT**. I want my **FREEDOM OF INFORMATION RECORDS**.

4 The bases of my Complaint goes as far back as 1986. At that time, I was working a fulltime job with Pruett Schaffer Paint & Chemical Co., Located at Stafford & Tabor Streets, Mc Keeps Rocks, Pgh, Pa. I started with the company in July 1978. The company was owned by Will and Elliot Coyle. In March of 1986, I got a part time job with the Duquesne Club, located at 6<sup>th</sup> Avenue, Downtown Pittsburgh, Pa. During the 10 years I worked at the Duquesne Club, I mostly worked as a concierge. Mr. Mal Rex ran total operations of the Club. My employer was Will and Elliot Coyle, owners of Pruett Schaffer Chemical Co. They often frequented the club. At both Pruett Schaffer Co. and the Duquesne, I had excellent work records. I received my profit sharing from Pruett Schaffer.

5 During the summer of 1986, my brother and I decided to go and have a few beers at the End Zone Bar. While at the End Zone Bar, I happened to get into a conversation with a fellow by the name of Joey Bertone. Mr. Bertone and I talked for quite a while and then we went outside to look at his new Lincoln. After our conversation we shook hands and Mr. Bertone went his way and I went my way.

6 I had never seen Joey Bertone before this particular evening and I never saw him after this evening. I had gone to the End Zone Bar no more than 4 times. I never heard that it might or might not have a bad reputation. I don't believe it did. So far as Joey Bertone was concerned, I don't know if he was ever at the bar before this evening or not.

7 About a month or so later after going to the End Zone Bar, my brother called me at my job at Pruett Schaffer to tell me to put on the TV. It didn't matter what station—they were all showing pretty much the same thing-- they were reporting the disappearance of Joey Bertone. Since then He was never found.

8 The TV stations were reporting that Joey Bertone was involved in the Mafia and that he was involved in illegal activities and that the FBI was watching him 24/7.

9 Now I know that if the FBI was watching Bertone 24/7, but I was seen with him. And I'm sure if that was the case, then I too was checked out. I believe that's the way it should be. However, if, in fact, the FBI checked me out, then they would have seen that I was never involved in any wrong doings and I was never in any Mafia or connected with Joey Bertone.

10 I'm stating hear and now that the one time encounter I had with Joey Bertone was just enough for the FBI to put my name either on an FBI Watch List or else my name was put on the Racketeer Influenced Corrupt Organizations (RICO).

11 I'm stating that Mr. David Hardy points out in Exhibit #2 of his **SECOND DECLARATION OF DAVID M. HARDY**, that he had at his command 277 FBI Agent search for my name and at no time did my name ever come up. I'm accusing Mr. Hardy of being guilty of FBI Misconduct. My name is on the FBI Watch List/or RICO List.

12 In 1996, I gave up the job at the Duquesne Club because I wanted the weekends off. I decided to drive a school bus. I went to several companies and at every company I was told I could start work the next day because I had previous school bus driving experience.

13 The next day when I went to start work, the very person who hired me the day before wouldn't even see me. That went on at every school bus company.

14 I decided to hire an attorney to do a background check. I contacted at least 6 or even more attorneys and every attorney said they would take my case or help me. Each and every attorney agreed to do a background check for me and after discussing the cost--- which I agreed to--- the attorney told me to come into his/her office for the next day. I agreed. About a half hour later the attorney would call me back and say that they refused to represent me and hang up. This happened every time.

15 I'm stating that the onetime encounter I had with Joey Bertone was enough for the FBI to put my name on the FBI's Watch List/RICO List. I've never been charged with any felony, that's because I did nothing criminal.

16 If any written charges were ever sent to me, then those charges went to my brother's house. He lives in Baldwin or Whitehall, Prospect Rd., Pittsburgh, Pa. My brother has a son named Anthony **William** DeGenes, I'm Anthony **Angelo** DeGenes. I never received and criminal charges.

17 I'm denied my US Constitutional Right to hire an attorney to do a simple background check in order to see what's going on in my life, which I should have a right to do but that right is being denied me. Just as a criminal is stripped of his rights, so too, am I denied my right to my **Freedom of Information Records**

18 I've been dealing with an ongoing investigation that's directed against me for many years now and this investigation came about because of that one time encounter I had with Joey Bertone, which gave the FBI the excuse to put my name on the FBI Watch List/RICO List, which made it appear that I was also connected with illegal activities and part of the Mafia. I'm also bringing this action against the FBI/Mr. Hardy because David Hardy is guilty of FBI Misconduct

**Relief:** I'm stating that the FBI/Mr. David Hard is guilty of FBI Misconduct. Mr. Hardy lied in his Exhibit #1, which he sent to me titled '**SECOND DECLARATION OF DAVID M. HARDY**', when he stated that he had 277 Agents do a search of my name and my name never came up in that search. My name is, in fact, part of a defamatory, slanderous campaign directed against me that results in a never ending investigation.

**Relief:**

Also, I would like the Court to appoint an attorney to represent me. Also, I'm bringing monetary damages. I would like to have a court reporter present.

I'm requesting a jury trial

THE UNITED STATES FEDERAL COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA  
700 GRANT STREET  
PITTSBURGH, PA., 15219

DIRECTOR CHRISTOPHER WRAY  
FEDERAL BUREAU OF INVESTIGATION  
935 PENNSYLVANIA AVENUE, N.W.  
OFFICE OF THE ASSISTANT ATTORNEY GENERAL, MAIN  
WASHINGTON, D.C. 20530--0001

DAVID M. HARDY  
FEDERAL BUREAU OF INVESTIGATION  
SECTION CHIEF  
RECORDS/INFORMATION DISSEMINATION SECTION  
RECORDS MANAGEMENT DIVISION  
170 Marcel Drive  
WINCHESTER, VIRGINIA 22602-4993


SCOTT W. BRADY  
UNITED STATES ATTORNEY  
UNITED STATES ATTORNEY'S OFFICE  
JOSEPH F. WEIS, JR  
U.S. COURTHOUSE  
700 GRANT STREET, SUITE 4000  
PITTSBURGH, PA., 15219

JOSH SHAPIRO  
ATTORNEY GENERAL  
PENNSYLVANIA OFFICE OF ATTORNEY GENERAL  
STRAWBERRY SQUARE  
HARRISBURG, PA., 17120

WILLIAM BAR  
UNITED STATES ATTORNEY GENERAL  
US DEPARTMENT OF JUSTICE  
950 PENNSYLVANIA AVENUE NW  
WASHINGTON, DC 20530—0001

ANTHONY A. DeGENES  
PRO SE Plaintiff:  
300 VAN WYCK AVENUE  
PITTSBURGH, PA., 15228  
PHONE: 412 884 6793  
adegenes@verizon.net

SIGN



Anthony A. DeGenes